

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Minnesota Chamber of Commerce, *a*
Minnesota nonprofit corporation,

Plaintiff,

vs.

John Choi, *in his official capacity as*
County Attorney for Ramsey County,
Minnesota; George Soule, *in his official*
capacity as Chair of the Minnesota
Campaign Finance and Public Disclosure
Board; David Asp, *in his official capacity*
as Vice Chair of the Minnesota Campaign
Finance and Public Disclosure Board;
Carol Flynn, *in her official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Margaret Leppik, *in her official capacity*
as Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Stephen Swanson, *in his official capacity*
as Member of the Minnesota Campaign
Finance and Public Disclosure Board; and
Faris Rashid, *in his official capacity as*
Member of the Minnesota Campaign
Finance and Public Disclosure Board,

Defendants

Case No.: 0:23-cv-02015

**SUPPLEMENTAL
DECLARATION OF ERIC
NERLAND IN SUPPORT OF
PLAINTIFF’S MOTION FOR
SUMMARY JUDGMENT AND IN
OPPOSITION TO
DEFENDANTS’ MOTION FOR
SUMMARY JUDGMENT**

I, Eric Nerland, hereby declare:

1. I am the co-founder and CEO of Lake of the Woods Cannabis Company (“LW”). I have held this position since 2022.

2. LW is a privately-held C-corporation incorporated in Minnesota with its principal place of business in Warroad, Minnesota.

3. LW currently manufactures and sells CBD beverages and products as allowed by Minnesota law. LW intends to open dispensaries in Minnesota and sell adult use cannabis once legal to do so.

4. Cannabis products are highly regulated on the municipality, city, county, state, and federal government level.

5. In 2022, Minnesota legalized the sale and consumption of edibles containing small amounts of hemp-derived THC.

6. On May 30, 2023, Governor Tim Walz signed an expansive cannabis legalization bill into law that allows for the recreational use of cannabis starting August 1, 2023. The law further provides that the sale of adult use cannabis in Minnesota will be legal in 2025.

7. LW has been actively researching candidates and campaigns that are pro-cannabis and support future dispensary businesses in the following Minnesota counties: Olmstead, Koochiching, Goodhue, Wabasha, and Roseau.

8. In August 2024, LW made an independent expenditure by purchasing advertisement space in the Roseau Times-Region and advertising that LW supports the re-election of Representative John Burkel in District 01A. The advertisement was published in the August 26, 2024 edition.

9. Attached as **Exhibit A** is a true and correct copy of the advertisement.

10. LW continues to be a “foreign influence corporation” as defined by the statute and therefore would be prohibited from making this independent expenditure if the statute became effective.

11. LW could not have made this independent expenditure if the Court had not enjoined the effectiveness of the statute.

12. LW made the expenditure at this time because, as the election is now quickly approaching and only a couple months away, we believe voters are focusing on the upcoming election more closely and therefore the advertisement would have a greater impact than if we had expended these funds earlier.

13. LW intends to continue to participate in the public conversation on cannabis businesses in the current and future election cycles because it is operating as a legal manufacturer of CBD products and hopes to sell adult use cannabis beginning in 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 6, 2024.

Eric Nerland
Eric Nerland

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Exhibit A

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Congratulations to all race participants and a big thank you for supporting Yellow

all the volunteers and those who came to cheer on the walkers and runners.

CASE 0:23-cv-02015-ECT-JFD Doc. 160 Filed 09/06/24 Page 5 of 5

Taylor Hahn, Brita Comstock, Amanda
and Brittany McGregor

LAKE OF THE WOODS *Cannabis Company*

**SUPPORTS
REPRESENTATIVE JOHN BURKEL
for RE-ELECTION IN DISTRICT 01A**

"This is an independent expenditure prepared and paid for by Lake of the Woods Cannabis Company, (PO BOX 242, Baudette, MN 56623). It is not coordinated with or approved by any candidate nor is any candidate responsible for it."

2024